Exhibit B to
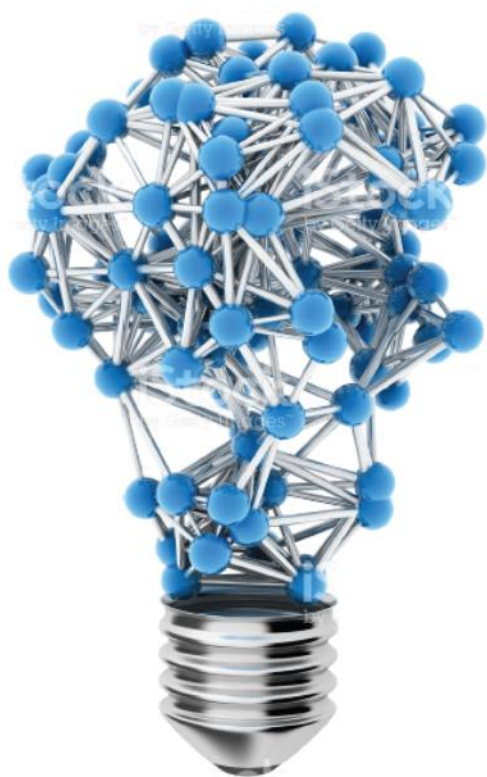# Stipulation of Settlement
(Notice Plan)

NOTICE ADMINISTRATION PLAN

IN RE ASHLEY MADISON CUSTOMER DATA SECURITY BREACH LITIGATION
MDL No. 2669

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Specific Media Recommendations

We have developed a media plan that will provide notice to class members in the *Ashley Madison Data Breach Litigation.*   The goal of the plan is to provide a defensible due process notice plan to the members of the class and reach at least 75% of the target audience.   Plan details are summarized below, along with pertinent information that informed the recommendation.

TARGET AUDIENCE

The potential "class" in this case consists of all people were a part of the Ashley Madison data breach. Data from GfK MRI 2016 Doublebase was used to profile the class. This brand is not a measured entity in MRI; as a result, the following target definition was used to profile class members:

- Internet Activities Done Last 30 days [Participated in on-line dating]

You will note that target definition is intentionally over-inclusive. We are targeting *all* users who have participated in online dating as opposed to just those who have used Ashley Madison. This is necessary since the syndicated data does not itemize or differentiate among various dating services. Based on the target definition, the potential audience size is estimated at 5,671,000. Additionally, it is worth noting that the MRI data, identifies 737,000 individuals as being married. However, if we were to use only the smaller universe of married individuals, there is substantial risk that the demographic data along with media consumption habits will be inaccurate due to such a low sample size. Therefore, this over inclusive target audience, based on objective syndicated data, will allow the parties to report the reach and frequency to the court, with the confidence that the reach is within the target audience and the number of exposure opportunities complies with due process, and exceeds the Federal Judicial Center's threshold as to reasonableness in notification programs.
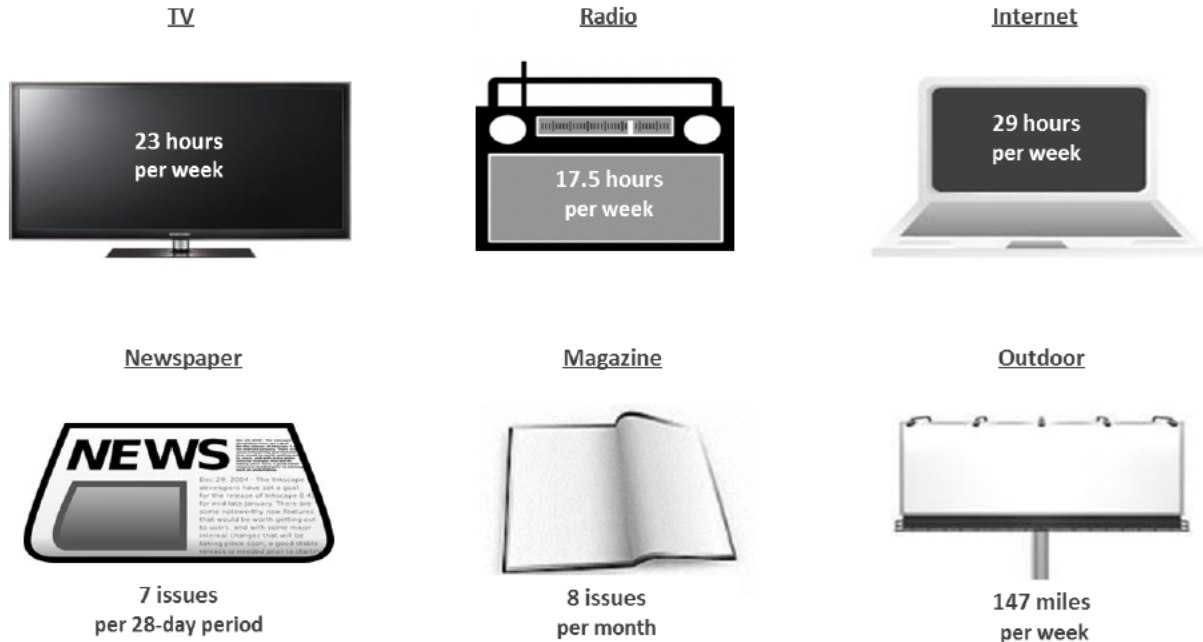
This target group can be described as having the following characteristics:

- Adults ages 25-44 with an average age of 38
- 13% are married (737,000 people)
- 48.8% have a college degree
- 57.0% live in households with total income below $75K
- 74.0% are employed, with most working full time (60.1%)

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MEDIA SELECTION

A review of media quintiles, which measure the degree to which an audience uses media relative to the general population, shows that print and internet are the strongest platforms through which to reach potential class members based on above average usage.

TV	Radio	Internet
23 hours per week	17.5 hours per week	29 hours per week

Newspaper	Magazine	Outdoor
7 issues per 28-day period	8 issues per month	147 miles per week

Given that the target audience are heavy readers of magazines as compared to the general public, we recommend running an insertion in a publication(s) that shows strong reach towards the target audience. Likewise, given the heavy amount of time our audience spends on the internet, we will utilize high impact banner ads to reach the class. Internet advertising can be highly targeted while delivering strong reach to the class. This will allow us to deliver an effective reach level for notice messaging while maximizing efficiencies.

ONLINE

A programmatic partner is recommended for online media. Through this partnership, we will be able to focus solely on the individual rather than specific websites.

Multiple targeting layers will be implemented to help ensure delivery to the most appropriate users, inclusive of search targeting, category contextual targeting, keyword contextual targeting, and site retargeting. Inventory will run on desktop and mobile devices to reach the most qualified audience. Search terms will be relevant to dating, Ashley Madison, and marriage. Targeting users who are currently browsing or have recently browsed content in categories

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such as dating sites and data breaches will also help qualify impressions to ensure messaging is served to the most relevant audience.

The below charts represent the inventory that will run in support of this notice program.

75% Reach Option:

Digital Tactic	Timing	Placement	Impressions
Programmatic Display/Mobile	4-weeks	Search Retargeting, Category Contextual Targeting, Keyword Targeting, Demographic Targeting, Site Retargeting, Purchase Data Targeting	11,484,000

We recommend implementing a 4-week desktop and mobile campaign, utilizing standard IAB sizes (160x600, 300x250, 728x90, 300x600, 320x50, 300x50). A 3x frequency cap will be imposed to maximize reach.

Also included with the digital recommendation is Lotame, a demand management platform (DMP), and Integral Ad Science (IAS), an online ad verification and security provider, to provide a greater quality of service to ad performance. Using Lotame, we can learn more about the online audiences we are reaching. Through pixels attached to the creative behind the scenes, we collect data on users who are served impressions, who click, and who convert. Demographic profiles can be developed and leveraged for immediate changes in targeting strategies to increase the overall performance of digital campaigns. The insights help us to understand the type of user profile that is most valuable to campaign success. Additionally, with Lotame we can create first-party audiences based on site-traffic.

Integrating with IAS provides another level of safety to ad campaigns. With the threat of bot-fraud and questions around inappropriate content, IAS, the leading company in ad verification, gives us and our advertisers peace of mind. IAS analyzes each impression and prevents advertisers from fraudulent activity and unsafe content.

OPTIMIZATION AND CONVERSIONS
In order to track campaign success, we will implement conversion pixels throughout the case filing website to better understand audience behavior and identify those most likely to convert. The programmatic algorithm will change based on success and failure to generate conversions throughout the process. Successful conversion on the Claim Submission button will be the primary goal, driving optimizations.

PRINT
To identify the best print vehicle for delivering the message to the target audience, MRI was used to analyze and filter publications to determine the titles with the highest reach against our target

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audience. *People* was chosen as the best title for this notice program due to its relevant editorial content and strong reach towards the target audience. A ½ page B&W insertion is recommended.

Publication	Circulation	Target Audience
People	3,510,533	1,072,000

For the 75% reach option, the above title is recommended along with an additional insertion in *Sports Illustrated.* This insertion is also a ½ page B&W.

Publication	Circulation	Target Audience
Sports Illustrated	3,023,197	410,000

PLAN DELIVERY

The recommended notice plan will deliver 75.3% reach with an average frequency of 3.04.

The FJC's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* considers 70-95% reach among class members reasonable. Here, the reach is within the target audience and the number of exposure opportunities complies with due process, and exceeds the Federal Judicial Center's threshold as to reasonableness in notification programs.

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